

From: [Coleman, Sam](#)
To: [Stanislaus, Mathy](#); [Breen, Barry](#); [Feldt, Lisa](#)
Cc: [Edlund, Carl](#); [Phillips, Pam](#)
Subject: FW: West Fertilizer - RMP info and Tier II
Date: Thursday, April 18, 2013 10:43:40 AM

From: Ruhl, Christopher
Sent: Thursday, April 18, 2013 10:27 AM
To: Coleman, Sam; Phillips, Pam; Gray, David; Edlund, Carl
Cc: Delgado, Eric; Petersen, Chris; McQuiddy, David; Smith, Monica; Broyles, Ragan; Webster, Susan
Subject: West Fertilizer - RMP info and Tier II

West Fertilizer

6SF conducted an inspection of the RMP at West Chemical and Fertilizer on March 16, 2006. Deficiencies identified included:

Failure to update its RMP in a timely manner. Due in 2004, didn't update until 2006.

Failure to document that hazards identified in the hazard review had been addressed.

Operating procedures failed to address consequences of deviation.

Poor employee training records.

Had not developed a formal written maintenance program.

The facility was fined \$2,300.00 on August 14, 2006. The facility self-certified that they had corrected issues.

Offsite Consequence Analysis

Worst case release – 54,000 lbs anhydrous ammonia released as a gas over 10 minutes with a distance to toxic endpoint of 1.5 miles. Population within a 1.5 mile circle – 2,500.

Alternative Release Scenario – Loss of 11,9.8 lbs of anhydrous ammonia from a transfer hose failure over 2 minutes with a distance to endpoint of 0.83 miles. Population within a 0.83 mile circle -1,200.

The facility also reported the presence of 54,000lbs of anhydrous ammonia on site within their Tier II report to the State of Texas.